

Sandra Wolfe

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON

IN RE: ETHICON, INC.,) MASTER FILE
PELVIC REPAIR SYSTEM) NO. 2:12-MD-02327
PRODUCTS, LIABILITY)
LITIGATION) MDL NO. 2327

) JOSEPH R. GOODWIN
THIS DOCUMENT RELATES TO) US DISTRICT JUDGE
SANDRA WOLFE, ET AL., v.)
ETHICON, INC., ET AL.)
CASE NO. 2:12-CV-00335)

THURSDAY, NOVEMBER 5, 2015

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Videotaped deposition of Sandra Wolfe, held at the Bryan Cave, LLP, 221 Bolivar Street, Jefferson City, Missouri, commencing at 11:29 a.m., on the above date, before Carrie A. Campbell, Registered Merit Reporter, Certified Realtime Reporter, Illinois, California & Texas Certified Shorthand Reporter, and Missouri Certified Court Reporter.

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1	INDEX	1	VIDEOGRAPHER: We are now on
2	PAGE	2	the record.
3	APPEARANCES.....	3	My name is Ed Foppe. I'm a
4	EXAMINATIONS	4	certified legal video specialist
5	BY MS. STRAUSS.....	5	representing Golkow Technologies.
6		6	Today's date is November 5,
7	EXHIBITS	7	2015.
8	No. Description	8	This is the video deposition of
9	1 Notice of deposition	9	Sandra Wolfe in the matter of Sandra
10	2 Plaintiff Profile Form	10	Wolfe, et al., versus Ethicon,
11	3 Plaintiff fact sheet	11	Incorporated, et al.
12	4 Medical records	12	Counselors, will you please
13		13	identify yourselves?
14	(Exhibits attached to the deposition.)	14	MR. ZEVAN: David Zevan for
15		15	Miss Wolfe.
16		16	MS. STRAUSS: Bettina Strauss
17	CERTIFICATE.....	17	for the Ethicon defendants.
18	LAWYER'S NOTES.....	18	VIDEOGRAPHER: The court
19		19	reporter is Carrie Campbell, and she
20		20	will now swear in the witness.
21		21	
22		22	SANDRA WOLFE,
23		23	of lawful age, having been first duly sworn
24		24	to tell the truth, the whole truth and
	Page 3		Page 5
1	APPEARANCES:	1	nothing but the truth, deposes and says on
2	ZEVAN & DAVIDSON	2	behalf of the Defendants, as follows:
3	BY: DAVID M. ZEVAN, ESQUIRE	3	
4	DZevan@zevandavidson.com	4	DIRECT EXAMINATION
5	1 North Taylor Avenue	5	QUESTIONS BY MS. STRAUSS:
6	St. Louis, Missouri 63108	6	Q. Good morning, Mrs. Wolfe. My
7	(314) 588-7200	7	name's Bettina Strauss. I represent Ethicon
8	Counsel for Plaintiffs	8	in this lawsuit that you've brought
9		9	concerning your Prolift® and your TVT®
10	BRYAN CAVE, LLP	10	surgeries.
11	BY: BETTINA J. STRAUSS, ESQUIRE	11	Okay? What we're doing today
12	bjstrauss@bryancave.com	12	is a deposition.
13	211 North Broadway, Suite 3600	13	Have you ever had your
14	St. Louis, Missouri 63102	14	deposition taken before?
15	(314) 259-2000	15	A. No.
16	Counsel for Defendants	16	Q. Okay. Have you had an
17		17	opportunity to meet with your counsel to
18	VIDEOGRAPHER:	18	prepare for the deposition?
19	ED FOPPE, CLVS	19	A. Yes.
20	---	20	Q. All right. I'm not asking you
21		21	for anything that you spoke about with your
22		22	counsel, but did you have the opportunity to
23		23	review documents before you came here today?
24		24	A. Yes.

2 (Pages 2 to 5)

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<p>1 Q. Okay. All right. How tall are 2 you, Mrs. Wolfe? 3 A. 5-6. 4 Q. Have you always been 5-6? 5 A. Yeah. 6 Q. Okay. You haven't lost any 7 height over the years? 8 A. I don't think so. Maybe. 9 Q. Okay. 10 A. Maybe a little. I don't think 11 so, though. 12 Q. And I'm sorry to ask you, but 13 how much do you weigh? 14 A. I think at this time right now, 15 probably about 160 pounds. 16 Q. All right. Has your weight 17 fluctuated over your lifetime? 18 Has it stayed fairly similar? 19 A. I've always actually -- was so 20 thin when I was young, I used to drink malts 21 and do everything I could to try to gain 22 weight. 23 And then, I don't know, it's 24 been about -- about eight or nine years ago I</p>	<p>1 kind of thing. 2 Q. So I probably didn't ask the 3 question very well. 4 Was there anything in 5 particular that you did in order to lose the 6 weight other than take the thyroid medicine? 7 A. No. 8 Q. Okay. Not -- you're not 9 somebody who went on a particular diet or 10 anything like that? 11 A. No. 12 Q. Okay. How is it that you are a 13 nutritionalist? 14 Tell me about that. 15 Where'd you get your training? 16 A. I don't -- I've trained myself. 17 Q. Okay. 18 A. That's why I say I'm not 19 licensed, but I have been doing research on 20 nutrition since about 1973. 21 And I belong to the biggest 22 alternative medicine group in the world, I 23 believe, called Life Extension. I'm sure 24 you've heard of it.</p>
<p>1 did gain a little bit of weight, and I didn't 2 know why because I hadn't changed my eating 3 or anything that I was doing. And then 4 that's when I realized I had a hyperthyroid 5 thing. Hypothyroid. 6 And I do take a small thyroid 7 pill every morning, but that's the only thing 8 that I take of any kind as far as 9 medication-wise or anything. 10 Q. So at your -- 11 A. And since I started on that, I 12 lost the weight back again. 13 Q. All right. So what was your 14 highest weight ever? 15 A. 200 probably. 16 Q. And then did you go on a weight 17 loss regimen in order to lose the weight? 18 A. Well, yes and no maybe, because 19 I take the thyroid medicine, but I also -- 20 like I said, I'm a nutritionalist. I do take 21 a lot of supplements; not anything 22 necessarily to lose weight but to maybe 23 maintain, you know, maintain -- maintain my 24 health and my weight and all, you know, that</p>	<p>1 Q. Life Extension? 2 A. And I put my husband and 3 myself, about ten years ago, on an anti-age 4 and anti-disease regimen of supplements and 5 herbs and nutrients and things like that, and 6 we're both very healthy people. 7 Q. Do you have a list of what 8 those supplements are? 9 A. At home. 10 Q. Okay. You have -- is it a lot 11 of them? 12 A. Yeah, quite a few. 13 Q. Okay. Are you able to tell me 14 what they are or would you need the list? 15 A. I would need the list to tell 16 you what they are. 17 Q. Okay. 18 A. Because of the result of this 19 anti-age thing that we've gone on, I don't 20 ever even get a headache. I don't even get 21 anything wrong with me. That's why I'm so 22 upset about this operation thing, because I'm 23 a very, very healthy person. 24 Q. All right.</p>

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<p>1 A. In every other respect, I don't 2 have any other problems, other than this 3 vaginal and circulation thing because of the 4 operation.</p> <p>5 When I go places, people 6 have -- don't believe I'm the age that I am. 7 And I don't feel the age that I am, other 8 than that. And that's what so aggravating to 9 me, because I've taken such good care of 10 myself for so many years.</p> <p>11 Q. So you feel like you're a very 12 healthy person?</p> <p>13 A. Oh, definitely. Other than the 14 operation, I feel like I'm -- I'm healthy.</p> <p>15 Q. Okay. And we'll talk about 16 that. I promise.</p> <p>17 Tell me what kinds of things 18 you do to stay healthy other than the 19 anti-aging supplement regimen.</p> <p>20 A. Eat right. Try to sleep right. 21 Try to exercise.</p> <p>22 Q. What kinds of exercise do you 23 do?</p> <p>24 A. Well, I had been trying to do</p>	<p>1 A. Pretty much. 2 When I lived down in Florida, I 3 used to ride my bike six miles to the beach 4 and back.</p> <p>5 Q. Okay.</p> <p>6 A. I used to be able to do just 7 pretty much anything I wanted to do.</p> <p>8 Q. Now, help me with that. How 9 long ago was the living in Florida?</p> <p>10 A. That was --</p> <p>11 Q. Was that with your late 12 husband?</p> <p>13 A. Right. That was...</p> <p>14 Q. So until '97?</p> <p>15 A. Yeah, somewhere around there.</p> <p>16 Q. Okay. How old were you then?</p> <p>17 A. 50-something, 58, something 18 like that.</p> <p>19 Q. All right.</p> <p>20 A. But I was able to do exercise 21 long past that time. I mean...</p> <p>22 Q. Okay. So let's talk about in 23 the five years before your surgery. 24 How about that?</p>
<p>1 some leg -- leg and arm exercises, and for a 2 while I was walking, but it's getting very 3 difficult for me to do that.</p> <p>4 Q. It's getting more difficult for 5 you to do that?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. Why is that?</p> <p>8 A. Because the circulation 9 problems.</p> <p>10 Q. Tell me what you mean by 11 "circulation problems."</p> <p>12 A. Well, I have pain in my legs. 13 Right after I had that operation, I started 14 to feel pain, like spasm kind of things, in 15 my legs. And that was -- at first was kind 16 of at night when I was real quiet, but then 17 it got to where it started getting worse and 18 worse. And so I can't exercise like I used 19 to exercise.</p> <p>20 Q. Okay. Why don't you tell me 21 before your surgery what kind of exercise you 22 used to do.</p> <p>23 Did you do regular exercise or 24 was it --</p>	<p>1 Okay? So 2003 to 2008. 2 What kinds of exercise did you 3 do?</p> <p>4 Did you belong to a gym?</p> <p>5 A. No.</p> <p>6 Q. Okay.</p> <p>7 A. But I used to walk all over 8 Eldon, and I also -- we had bought that house 9 so I was doing all kinds of physical stuff, 10 painting and repairing and remodeling and all 11 kinds of stuff.</p> <p>12 Q. Okay. So the walking was an 13 exercise for you?</p> <p>14 A. Pretty much, yeah.</p> <p>15 Q. And how often did you walk and 16 how far?</p> <p>17 A. Usually at least three, four 18 days a week.</p> <p>19 Q. Okay.</p> <p>20 A. About three miles.</p> <p>21 Q. Did anyone go with you?</p> <p>22 A. No.</p> <p>23 Q. That's not something you and 24 your husband did together?</p>

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<p>1 cook?</p> <p>2 A. No.</p> <p>3 Q. Does he clean up?</p> <p>4 A. Yep, he helps with things</p> <p>5 around the house.</p> <p>6 Q. Okay. Who does the laundry?</p> <p>7 A. I do.</p> <p>8 Q. How about the housecleaning?</p> <p>9 A. Pretty much 75 percent I do and</p> <p>10 25 percent he does.</p> <p>11 Q. Okay. Does he -- does his</p> <p>12 25 percent have a category?</p> <p>13 A. He'll vacuum sometimes.</p> <p>14 Q. Mm-hmm.</p> <p>15 A. He vacuums and he'll dust. Not</p> <p>16 really dust, but clean things. Like he'll</p> <p>17 empty the dishwasher.</p> <p>18 Q. Do you-all have a yard?</p> <p>19 A. Yes.</p> <p>20 Q. Who handles the yard?</p> <p>21 A. Pretty much my husband most --</p> <p>22 mostly him, but we do have a land -- yard</p> <p>23 service that comes in, like, and blows</p> <p>24 leaves --</p>	<p>1 and everything, but not so much anymore.</p> <p>2 Q. Okay. So we talked about what</p> <p>3 you guys like to do together.</p> <p>4 How often do you travel?</p> <p>5 A. Well, my daughter, like I said</p> <p>6 before, lived in Montana for a few years, and</p> <p>7 we went there twice. One year, and then two</p> <p>8 years later we went again.</p> <p>9 And then we go to South Africa</p> <p>10 about -- well, we've been there twice, put it</p> <p>11 that way. No, we've been there three times</p> <p>12 since we moved in our house 11 years ago.</p> <p>13 Q. To see your son?</p> <p>14 A. Right.</p> <p>15 And when we go there, we spend</p> <p>16 a month, maybe sometimes two months there.</p> <p>17 Q. You like it there?</p> <p>18 A. Oh, it's beautiful there.</p> <p>19 Q. What kinds of things do you do</p> <p>20 in South Africa?</p> <p>21 A. Sit in the swimming pool, go in</p> <p>22 the hot tub, go to the beach, go to the</p> <p>23 mountains to some degree.</p> <p>24 Q. When you say "mountains," is</p>
<p>1 Q. Okay. Do you-all garden?</p> <p>2 A. -- fertilize and stuff like</p> <p>3 that.</p> <p>4 We don't garden for vegetables.</p> <p>5 We have lots of flowers. In fact, we get</p> <p>6 yard of the month every year almost.</p> <p>7 Q. Yard of the month?</p> <p>8 A. We have a lot of flower beds</p> <p>9 and things like that.</p> <p>10 Q. This is an award you get in</p> <p>11 Eldon?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And who handles the</p> <p>14 garden?</p> <p>15 A. Pretty much my husband.</p> <p>16 Q. This is -- that's his thing,</p> <p>17 gardening?</p> <p>18 A. Yeah. I planted a lot of the</p> <p>19 flowers when we first moved there, which was</p> <p>20 back in 2001.</p> <p>21 Q. But you don't take care --</p> <p>22 A. But I don't take -- I don't do</p> <p>23 that much anymore like I used to. I used to</p> <p>24 do quite a bit of, you know, the yard stuff</p>	<p>1 that climbing --</p> <p>2 A. No.</p> <p>3 Q. -- or hiking?</p> <p>4 A. No, not hiking, no. We just go</p> <p>5 up in the mountains in a car.</p> <p>6 Q. Okay.</p> <p>7 A. And they had big huge malls</p> <p>8 there. And my son loves to go out to clubs</p> <p>9 and go out to dinner and all those kinds --</p> <p>10 we have a really good time when we go there.</p> <p>11 Q. So do you go to clubs with him?</p> <p>12 A. Yeah, to a degree.</p> <p>13 Q. So like dancing?</p> <p>14 A. No, not really much dancing,</p> <p>15 but he loves to dance. He used to be a</p> <p>16 professional dancer so he loves to dance.</p> <p>17 But everything we do there is</p> <p>18 pretty much at my son's expense. He even</p> <p>19 pays for the trip there and back, which is</p> <p>20 about \$4,000, so we enjoy doing that.</p> <p>21 And then my husband has a</p> <p>22 sister and brother that live in California,</p> <p>23 one in Los Angeles area and one in</p> <p>24 Sacramento, and we go there sometimes to see</p>

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<p>1 them.</p> <p>2 Q. And are you --</p> <p>3 A. And then --</p> <p>4 Q. Go ahead.</p> <p>5 A. And then he's from Sioux Falls,</p> <p>6 South Dakota so we do go there. That's where</p> <p>7 my sister-in-law -- his -- his sister-in-law</p> <p>8 and brother live, and we go there and see</p> <p>9 them.</p> <p>10 Q. Okay. And are you pretty much</p> <p>11 a self-sufficient traveler, meaning you pack</p> <p>12 your bags, you take your luggage, or does</p> <p>13 your husband help you with that?</p> <p>14 A. Oh, my husband does all the</p> <p>15 heavy -- the luggage and all that kind of</p> <p>16 stuff.</p> <p>17 Q. Okay.</p> <p>18 A. And we travel by car when we go</p> <p>19 to South Dakota, and we also traveled by car</p> <p>20 when we went to Montana, but the other trips</p> <p>21 we make, of course, in a plane.</p> <p>22 Q. Okay.</p> <p>23 A. And it has gotten a little more</p> <p>24 difficult for me to go to South Africa, too,</p>	<p>1 Q. And do you go at a particular</p> <p>2 time of the year?</p> <p>3 A. We go in the wintertime.</p> <p>4 Q. Because it's summer there?</p> <p>5 A. It's summer there.</p> <p>6 Q. Okay. And have there -- so did</p> <p>7 you have sort of an every-three-years kind of</p> <p>8 approach to South Africa?</p> <p>9 A. Well, no. Took my -- it took</p> <p>10 me five years to get my husband to go there</p> <p>11 in the first place, because he had been in</p> <p>12 the service, and he didn't really want to go</p> <p>13 out of his country anymore because he had</p> <p>14 been in bad situations.</p> <p>15 And then when he went there and</p> <p>16 we spent two months there, he never stopped</p> <p>17 talking about it when we came back because it</p> <p>18 was so wonderful there.</p> <p>19 And then we -- like I said,</p> <p>20 then we went two years again, then we went</p> <p>21 again.</p> <p>22 Q. So would next year would be the</p> <p>23 next year you would go?</p> <p>24 A. Possibly.</p>
<p style="text-align: center;">Page 111</p> <p>1 which is aggravating, because it takes</p> <p>2 24 hours to get to South Africa.</p> <p>3 And I actually had been there a</p> <p>4 couple of times before Brian and I married so</p> <p>5 I've been there about five times. But I</p> <p>6 gotta say, the last two times that we've gone</p> <p>7 have been really rough for me.</p> <p>8 Q. When did you go?</p> <p>9 A. We went two years ago, and then</p> <p>10 we went -- about three years before that we</p> <p>11 went. And the trip is getting more -- it's</p> <p>12 harder for me.</p> <p>13 Q. Harder in what way?</p> <p>14 A. Well, for one thing, if I start</p> <p>15 bleeding, and for another thing, the leg</p> <p>16 circulation, my lower half of my body, the</p> <p>17 circulation. Because you're sitting in a</p> <p>18 plane for 24 hours.</p> <p>19 Q. So you went -- if I have it</p> <p>20 correctly, you went there in 2013 --</p> <p>21 A. About that.</p> <p>22 Q. -- and also in 2010</p> <p>23 approximately?</p> <p>24 A. Approximately then.</p>	<p style="text-align: center;">Page 113</p> <p>1 Q. Okay.</p> <p>2 A. Next year or the year after.</p> <p>3 Q. And are you -- is that sort of</p> <p>4 on your list?</p> <p>5 A. Well, yes and no.</p> <p>6 Like I said, the trip's</p> <p>7 becoming very difficult for me so I'm</p> <p>8 thinking that my son's going to have to come</p> <p>9 up with a better place on the airplane like</p> <p>10 a -- what do you call that?</p> <p>11 Q. Like a first class ticket?</p> <p>12 A. First class ticket, right, for</p> <p>13 me to go again. Which I'm sure he will.</p> <p>14 Q. You want one of the pods?</p> <p>15 A. I'm sure he will do that. But</p> <p>16 I think that's what I'm going to have next</p> <p>17 time, is first class.</p> <p>18 Q. All right. So you started to</p> <p>19 tell me a little bit about the problems that</p> <p>20 you're having currently.</p> <p>21 One is you say you get</p> <p>22 fatigued; is that right?</p> <p>23 A. Yeah.</p> <p>24 Q. And tell me when that happens.</p>